

# EXHIBIT 9

## Alejandra Avila

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**From:** Walker, James (CIV) <James.Walker3@usdoj.gov>  
**Sent:** Thursday, February 7, 2019 9:49 PM  
**To:** Alejandra Avila; Robins, Jeffrey (CIV)  
**Cc:** Glenn Moramarco; Kenneth Levine; Jeremy Hollander; Nina Perales; Jack Salmon; Douglas H. Hallward-Driemeier; Raishay Lin; Todd <Todd. Disher@oag. texas. gov> Disher; Siegle, Emerson (Emerson.Siegle@ropesgray.com); Adam Biggs  
**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Hi Alejandra,

We are working on providing the material as quickly as possible. The order dismissing the governor of Maine today of course changes the data production we intended to provide, so we have to go back and make adjustments for that. We should be able to get back to you soon.

Best,  
James

**James Walker**

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U.S. Department of Justice, Civil Division  
Office of Immigration Litigation – District Court Section  
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**From:** Alejandra Avila <[Aavila@MALDEF.org](mailto:Aavila@MALDEF.org)>  
**Sent:** Thursday, February 07, 2019 6:35 PM  
**To:** Robins, Jeffrey (CIV) <[jerobins@CIV.USDOJ.GOV](mailto:jerobins@CIV.USDOJ.GOV)>  
**Cc:** Glenn Moramarco <[Glenn.Moramarco@law.njoag.gov](mailto:Glenn.Moramarco@law.njoag.gov)>; Kenneth Levine <[Kenneth.Levine@law.njoag.gov](mailto:Kenneth.Levine@law.njoag.gov)>; Jeremy Hollander <[Jeremy.Hollander@law.njoag.gov](mailto:Jeremy.Hollander@law.njoag.gov)>; Nina Perales <[nperales@MALDEF.org](mailto:nperales@MALDEF.org)>; Jack Salmon <[jsalmon@MALDEF.org](mailto:jsalmon@MALDEF.org)>; Douglas H. Hallward-Driemeier <[Douglas.Hallward-Driemeier@ropesgray.com](mailto:Douglas.Hallward-Driemeier@ropesgray.com)>; Raishay Lin <[Raishay.Lin@ropesgray.com](mailto:Raishay.Lin@ropesgray.com)>; Todd <Todd. Disher@oag. texas. gov> Disher <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)>; Siegle, Emerson ([Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)) <[Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)>; Adam Biggs <[Adam.Biggs@oag.texas.gov](mailto:Adam.Biggs@oag.texas.gov)>; Walker, James (CIV) <[jwalker2@CIV.USDOJ.GOV](mailto:jwalker2@CIV.USDOJ.GOV)>; Alejandra Avila <[Aavila@MALDEF.org](mailto:Aavila@MALDEF.org)>  
**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Mr. Robins,

Please confirm when Federal Defendants intend to provide the supplemental production mentioned in your email below. As you know, it has been more than 7 weeks since Perez Defendant-Intervenors emailed their deficiency letter to you.

In addition, please advise whether Federal Defendants will address the remaining deficiencies noted in our letter. If Federal Defendants do not provide amended answers and a supplemental production pursuant to the deficiency letter, Perez Defendant-Intervenors will seek court intervention on this matter.

Thank you,

Alejandra Ávila  
Staff Attorney  
The Mexican American Legal Defense

and Educational Fund, Inc.  
110 Broadway, Suite 300  
San Antonio, TX 78205  
P: (210) 224-5476 ext. 204  
F: (210) 224-5382



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**From:** Robins, Jeffrey (CIV) [<mailto:Jeffrey.Robins@usdoj.gov>]

**Sent:** Monday, February 4, 2019 3:19 PM

**To:** Alejandra Avila

**Cc:** Glenn Moramarco; Kenneth Levine; Jeremy Hollander; Nina Perales; Jack Salmon; Douglas H. Hallward-Driemeier; Raishay Lin; Todd. Disher@oag. texas. gov Disher; Siegle, Emerson ([Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)); Adam Biggs; Walker, James (CIV)

**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Counsel,

I write to advise that Federal Defendants will be supplementing the prior responses with data for the newly added states and a chart reflecting the documents that correspond with each request for production.

Jeff

Jeffrey S. Robins  
Deputy Director  
Office of Immigration Litigation  
District Court Section  
(202) 616-1246

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**From:** Alejandra Avila <[Aavila@MALDEF.org](mailto:Aavila@MALDEF.org)>

**Sent:** Wednesday, December 19, 2018 4:48 PM

**To:** Robins, Jeffrey (CIV) <[jerobins@CIV.USDOJ.GOV](mailto:jerobins@CIV.USDOJ.GOV)>

**Cc:** Glenn Moramarco <[Glenn.Moramarco@law.njoag.gov](mailto:Glenn.Moramarco@law.njoag.gov)>; Kenneth Levine <[Kenneth.Levine@law.njoag.gov](mailto:Kenneth.Levine@law.njoag.gov)>; Jeremy Hollander <[Jeremy.Hollander@law.njoag.gov](mailto:Jeremy.Hollander@law.njoag.gov)>; Nina Perales <[nperales@MALDEF.org](mailto:nperales@MALDEF.org)>; Jack Salmon <[jsalmon@MALDEF.org](mailto:jsalmon@MALDEF.org)>; Douglas H. Hallward-Driemeier <[Douglas.Hallward-Driemeier@ropesgray.com](mailto:Douglas.Hallward-Driemeier@ropesgray.com)>; Raishay Lin <[Raishay.Lin@ropesgray.com](mailto:Raishay.Lin@ropesgray.com)>; Todd <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)> Disher <[Todd.Disher@oag.texas.gov](mailto:Todd.Disher@oag.texas.gov)>; Siegle, Emerson ([Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)) <[Emerson.Siegle@ropesgray.com](mailto:Emerson.Siegle@ropesgray.com)>; Adam Biggs <[Adam.Biggs@oag.texas.gov](mailto:Adam.Biggs@oag.texas.gov)>

**Subject:** RE: Texas et al. v. United States et al., No. 1:18-cv-00068

Jeffrey,

Attached please find Perez Defendant-Intervenors' deficiency letter related to our third set of discovery requests.

Thank you,

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and Educational Fund, Inc.  
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